



April 20, 2000

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All programs, if studied closely could use some improvements. I would like to comment on the proposed changes for USDA. I understand that there are sixteen proposed changes and I want to address each one.

1. Expand the use of long-term contracts.

I am not opposed to this change.

2. Test best-value contracting.

I would like for there to be a close look at making choices based on just the bottomline.

The performance of the company needs to be considered.

3. Update product specifications.

The specs for the USDA foods should be looked at very carefully. Our specs are different from industry standards. We need for our school children to have as little fat as possible in items such as ground beef. The specs for industry are very different what USDA has at the present time.

4. Allow vendors to use commercial labels.

This could cause the small school systems a great deal of problems. At present we have a difficult time with employees keeping these items separated. If they are have commercial labels we will never be able to keep our USDA inventory straight.

5. Move toward national umbrella contracts with processors.

This proposal appears to be a good thing until the processors explained that they do business with about fifty states. Getting everything set up in each state the way each state wants it means that they have to do fifty contracts. It would be great to only do one but each state is different.



6. Expand full substitutability of commodity product.

How will the receipt of these foods be guaranteed that they are getting what they ordered. A company gets an order for ground beef and they are running industry ground beef, they are not going to stop and run our less fat ground beef. They will ship us ground beef that is higher in fat. We need to be assured that we are getting American food. After the strawberry scare, we need to know that the food we are serving has been inspected and is good for human consumption.

7. Work with States to test the seamless commodity distribution concept.

We on the local level are questioning how we will know if we are getting our full planned assistance level (money). Trying to tell USDA product from industry product will be almost impossible. We have unskilled labor working in our kitchens and many days we have substitutes that have very little training working in our kitchens. A substitute and sometimes a regular worker is not going to check code numbers. This could turn into a nightmare.

8. Facilitate the processing of commodities with limited demand.

I don't object to this proposal if the product is something that children will eat. An example could be raisins into trail mix. This should be looked at carefully before the products are made. The product should be child tested.

9. Develop written hold and recall procedures.

I agree that this would be good.

10. Reduce the duration of product holds at the school level.

I agree that this would be good.

11. Publish commodity recall reimbursement procedures.

I agree that this would be good.

12. Provide computer connectivity to the school level.

I think we need to keep our contacts with our state department. I can pick up the telephone and talk with a state department person and get my problems solved within a reasonable time frame. I don't feel that someone in Washington is going to care about a little school system in South Georgia like our state department does.

13. Provide a single USDA point of contact.

This would not be good for the individual school districts. I don't feel that we would get the same type service that we are getting at the present time.

14. Work with States and partners to pilot-test improvements.

It would be almost impossible to pilot-test anything between now and December 2000 because it is already April and school will be out in about four weeks. To test-pilot anything one would need at least one school year. This calendar schedule only allows about three to four months and that is not a reliable test. I would also like to know who are the pilots and how they were chosen? I would also like to see an evaluation of the pilots before any thing is changed. There simply is not enough time for all this to take place before the end of December 2000.

15. Other Improvements: Facilitate use of 4/11 funds; encourage cooperatives; and relax truckload requirements.

I do support relaxing the truckload requirements however I am opposed to allowing local use of lunch reimbursement funds to be used to purchase DOD or other foods with USDA money. Again, who is going to protect the locals and guarantee that we are getting what we ordered.

16. Streamline paperwork and reporting requirements.

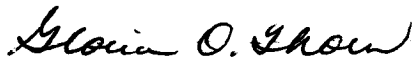
I have not seen any changes in any program that streamlined paperwork. Most of the time this streamlining makes more paperwork.

The 12% Rule will hurt our school system because we serve almost every child in this county. At approximately .0125 cents to .02 cents per meal reduction will reduce my reimbursement by thousands of dollars. We already have underpaid employees and we don't need a cut in revenue.

In summary, I am opposed to most of the proposals that have been suggested. These proposals don't seem to be supporting the local education sector; they all seem to benefit industry. My main question is at what price are we selling our school children's health. We, the adult population, should be trying to protect the health of our children and this proposal makes me think that we are trading our children's health for some industry person to make the almighty dollar.

I would like to ask for a list of comments so that I can determine what others think about these proposals. Thank you for your time and your consideration of my thoughts on these changes.

Sincerely,



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